

**Draft Regulation**  
**Application for licences under the Gambling Act**

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## 1 Legal framework, scope and definitions

### 1.1 The supervisory authority's power to issue orders

The right of the supervisory authority to issue a binding order is based on section 11(6) of the Gambling Act (xx/2025). According to that subsection, the control authority may issue more detailed regulations on the content, format and annexes of the application for a licence.

According to section 57 of the Gambling Act, the Finnish Licensing and Supervisory Authority is the supervisory authority. According to section 106 of the Act, the National Police Board shall act as the competent authority referred to in section 57 until 31 December 2026.

### 1.2 Legislation

The following regulations are relevant to the subject matter of this order:

- Gambling Act (xx/2025)
- Administrative Procedure Act (434/2003)
- Language Act (423/2003)
- Act on Electronic Services and Communication in the Public Sector (13/2003)
- Act on the Openness of Government Activities (621/1999)
- Accounting Act (1336/1997)
- Economic Activities Act (565/2023)
- Act on the Grey Economy Information Unit (1207/2010)
- Act on Criteria for Charges Payable to the State (150/1992)
- Money Laundering Act (444/2017)
- Regulation of the European Parliament and of the Council on electronic identification and electronic transactions in the internal market, eIDAS Regulation (EU) No 910/2014

### 1.3 Scope

This provision applies to applicants for the licences referred to in sections 5, 6 and 7 of the Gambling Act:

- applicant for an exclusive licence
- applicant for a gambling license
- applicant for a gambling software licence

## 1.4 Definitions

For the purposes of this provision, the following definitions shall apply. For the purposes of this regulation:

- *exclusive licence* means a licence granted for the forms of gambling referred to in section 5 of the Gambling Act
- *gambling licence* means a licence granted for the forms of gambling referred to in Section 6 of the Gambling Act
- *gambling software licence* means a licence authorising the manufacture, supply, installation and adaptation of gambling software used by licence holders referred to in Sections 5 and 6 of the Gambling Act

## 2 Format requirements for licence applications

### 2.1 Method of submission of applications

In accordance with Section 11(1) of the Gambling Act, applications for an exclusive licence, a gambling licence and a gambling software licence are made in writing to the supervisory authority. According to section 9 of the Act on Electronic Services and Communication in the Public Sector (13/2003), in the lodging and consideration of a matter, the required written form is also met by an electronic document delivered to the authorities.

The licences referred to in this provision may be applied for by means of an application form from the supervisory authority or by means of a free-text application in writing. Where the licence is applied for by means of an informal written application instead of a form, the written application shall contain, in accordance with this regulation, the information corresponding to that provided on the application form.

The licence application must be signed. The application may be signed either physically or electronically. The electronic signature shall be at least equivalent to an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014). By signing the application form, you certify that the information provided is correct. If a licence is applied for on behalf of a legal person, the person who signed the application must have the right to sign on behalf of the applicant or an authorisation from the person who is entitled to sign on behalf of the applicant to apply for the licence.

### 2.2 Language of the administrative procedure

According to section 1 of the Language Act (423/2003), the national languages of Finland are Finnish and Swedish. Section 2 of the Act guarantees the right of everyone to use their own language, either Finnish or Swedish, in public administration. The authority may provide a better linguistic service than required by the Language Act. According to section 12 of the Language Act, the language of proceedings in an administrative case before a bilingual authority shall be the language of the party concerned.

Under the provisions of the Language Act, the application for a licence is examined by the supervisory authority in Finnish or Swedish. The application for authorisation and its annexes must be submitted in Finnish or Swedish, at the choice of the applicant. When the case is brought, the language of the proceedings and the language of the decision shall be determined on the basis of the language in which the application was lodged.

If the application is accompanied by documents or copies of documents of which the original language is not in Finnish or Swedish, the control authority may, if necessary, request a translation of these documents into Finnish or Swedish. In such cases, the applicant is responsible for the translation of the documents, the translation costs and the delivery of the translations to the supervisory authority. The translation of the documents may delay the processing of the application case by the supervisory authority. The supervisory authority is not responsible for the delay incurred.

## 2.3 Public access to information

The processing of licences under the Gambling Act is governed by the Act on the Disclosure of Public Authority Activities (621/1999). If the application documents or their annexes contain information which the applicant considers to be confidential, the confidential information must be identified and indicated in the material to be submitted. In the case of confidential information, the reason for confidentiality must also be stated.

The assessment of the publicity of the information shall be carried out by the supervisory authority. The starting point for the assessment is the public nature of the authority's activities. Documents in the possession of the authorities are public, unless their publication has for compelling reasons been specifically restricted by an Act.

## 2.4 Fees for the processing of applications

There is a fee for processing an application for a licence. The fee is charged for each application submitted, regardless of the outcome of the procedure.

In 2026, the amount of the processing fee will be laid down in a decree of the Ministry of the Interior on the charging of fees for police services.

From the beginning of 2027, the amount of the fee will be laid down in the regulation on fees for services provided by the licensing and supervisory authority.

## 3 Report on the responsible persons and significant owners of the applicant for the licence

### 3.1 Responsible persons and significant owners of the applicant to be indicated in applications for authorisation

Where the applicant is a legal person, the application shall include information on the members and alternates of the applicant's board of directors, significant owners and senior management. The grant of licences within the meaning of the Gambling Act is sub-

ject to the condition that, in addition to the applicant legal person, natural persons in the aforementioned roles fulfil the conditions of reliability and suitability laid down in Article 10 of the Act.

The concepts of a significant owner and executive management have been clarified in section 10(3) of the Gambling Act and in the preparatory works for that provision. On this basis, a significant owner is defined as a person who directly or indirectly holds 25 % or more of the shares in a public limited liability company, or of the voting rights attaching to those shares, or, in the case of an entity other than a public limited liability company, an equivalent level of ownership or control. Senior management means the managing director of the applicant and the members of the management team.

If the applicant does not have a CEO and/or a management team, the natural persons responsible for the operational aspects of the business should be indicated as members of the executive management. Such persons may include, for example, persons responsible for finance, technology, marketing or regulatory compliance, general partners or other senior managers of the applicant.

### 3.2 Information to be provided on the applicant's responsible persons and significant owners

In order to assess the reliability and suitability of the applicant, the application for a licence shall identify, as described above, all persons who are members or alternate members of the applicant's board of directors, substantial owners or executive management. For these persons, the first name, surname, personal identification number or date of birth (primarily personal identification number) and their role in the legal person are indicated in the application.

Finnish citizens and foreigners permanently resident in Finland with a Finnish personal identification number indicate the Finnish personal identification number in the application. The notification of the Finnish personal identification number will enable the supervisory authority to verify the persons' data in the register of criminal offences and fines and to request from them the compliance audit report referred to in section 5 of the Act on the Grey Economy Information Unit. In this case, it is not necessary to provide other reports to assess the reliability and suitability of the natural person concerned unless the supervisory authority specifically requests it.

### 3.3 Reports on the applicant's responsible persons and significant owners

Section 11(2) of the Gambling Act lays down the information to be included in an application for a licence, unless the information is already available to the authority. As stated in the previous section (3.2) of this Regulation, in the case of Finnish nationals and foreign nationals permanently residing in Finland who have a Finnish personal identification number, the control authority is able to assess the reliability and suitability by verifying the details of the persons concerned in the register of fines and criminal offences and requesting a compliance audit report. Instead, other persons should provide the information and explanations necessary to assess reliability and suitability to the supervisory authority on their own initiative.

The following information and statements referred to in Section 11(2) of the Gambling Act shall be submitted for each member and deputy member of the applicant's Board of Directors, significant owner and member of the executive management, if the person concerned does not have a Finnish personal identity code. The following information is also provided for a natural person applying for a licence who does not have a Finnish personal identity number. The information shall be provided as separate supporting documents:

### **Extracts of fines and criminal records**

The application is accompanied by extracts of fines and criminal records. The extract from the register of fines should cover the period of three years preceding the submission of the application for the licence, and the extract from the Criminal Register should cover the period of five years preceding the submission of the application for the licence.

Another certificate, equivalent to a certificate from a fine and a criminal record, containing information on whether a person has been sentenced to a fine for a criminal offence in the three years preceding the submission of the application for authorisation or to a term of imprisonment in the five years preceding the submission of the application for authorisation may also be accepted as sufficient evidence.

### **Certificates of compliance**

The application for authorisation shall be accompanied by adequate explanations to assess the reliability and suitability of the applicant and of its significant owners and senior management. Pursuant to Section 10(2)(2) to (5) and Section 10(3) of the Gambling Act, when assessing the reliability and suitability of the applicant's significant owners and members of the executive management, attention shall be paid to the following aspects:

- whether the applicant is bankrupt or, based on their assets, is able to take care of their operations and meet their statutory obligations
- whether the applicant has debts being enforced through distress that are disproportionately large compared with their ability to pay, or debts that have been returned from distress due to certificates of insolvency
- whether the applicant has, or has had in the current year or in the preceding three calendar years, repeated or significant failures to fulfil their obligations relating to taxes or statutory payments
- whether a disqualification or temporary disqualification has been imposed on the applicant

In order to assess these issues, the application should be accompanied by certificates describing the performance of the obligations of the responsible persons of the applicant. The certificates shall contain sufficient information on the fulfilment of the obligations of the applicants concerned to ensure that the conditions for granting the authorisation are met. Proof of compliance may be provided by means of:

- proof of the person's tax debt status
- a certificate of the person's enforcement status
- a certificate stating whether the person is banned from doing business.

Instead of the above-mentioned certificates, applicants may also prove their trustworthiness and suitability in relation to the matters referred to in paragraphs 2-5 of subsection 2 of section 10 of the Gambling Act by means of other certificates, registration certificates or similar official documents.

Any documentary evidence of reliability and suitability, such as certificates and extracts from registers, that is submitted as an annex to an application for a licence shall indicate the name and contact details of the authority that prepared the document. The annexes shall be up-to-date. Documents up to six months old from the date of the application are considered to be up-to-date, provided that the information has not changed since the date of the document. The applicant is responsible for the accuracy and timeliness of the annexes.

## 4 Applying for an exclusive licence

### 4.1 Conditions for granting an exclusive licence

Under section 8 of the Gambling Act, an exclusive licence may be granted to a limited liability company controlled by the Finnish State as referred to in chapter 1, section 5 of the Accounting Act (1336/1997) and whose area of activity is the provision of gambling services, if it can be ascertained on the basis of the report received that the applicant and its owners and management meet the conditions for reliability and suitability laid down in section 10 of the Act.

According to section 5(4) of the Gambling Act, an exclusive licence cannot be granted to a holder of a gambling licence as referred to in section 6 of the Act.

According to section 57 of the Gambling Act, the licence is granted by the licensing and supervisory authority, which acts as the supervisory authority. According to section 106 of the Act, the National Police Board shall act as the competent authority referred to in section 57 until 31 December 2026.

### 4.2 Information to be provided in the application

The information and reports to be included in an application for an exclusive licence are laid down in section 11, subsections 2 and 3 of the Gambling Act. The following information and explanations will in principle be provided directly in the application:

#### **Name of the applicant**

The name of the applicant is the name of the applicant legal person.

#### **Identification data of the applicant**

For legal persons registered in Finland, the applicant's identification data refers to the company identification number.

### **Contact details of the applicant**

The application shall contain the contact details of the legal person applying for the licence. Contact details refer to postal address, e-mail address and telephone number.

### **Names and contact details of contact persons**

The application shall indicate the name and contact details of the natural person acting as the applicant's contact person for the processing of the application for a licence and the name and contact details of the natural person acting as the contact person for technical matters. Contact details will be indicated with an email address and a telephone number.

The application may also include details of other possible contact persons if the applicant has different contact persons for different matters. Information on other contact persons, if any, may be provided, for example, in the application form in the section dedicated to additional information.

### **Legal form of the applicant**

The application shall indicate the legal form of the applicant for the licence, such as, for example, the form of a company.

### **Details describing the ownership and management relationships of the organisation**

The application shall contain information on the members and alternate members of the board of directors, the main shareholders and the natural persons who are members of the executive management of the applicant legal person. For further details on the disclosure of this information, see chapter 3 of this regulation (see "Statement of the persons responsible for the applicant for a licence and the significant owners", sections 3.1, 3.2 and 3.3 of the regulation).

In addition, the application for authorisation shall include information about the enterprises and entities that are directly or indirectly linked to the applicant. Companies and associations directly or indirectly related to the applicant include at least<sup>1</sup>:

- a public limited company which is partly or wholly owned by the applicant company or entity (at least 25% of the shares must be relevant)
- a limited liability company that is a partner in a general partnership applying for a licence
- A company or entity linked to an applicant company or entity, through its responsible person or through another company or entity

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<sup>1</sup> Government proposal HE 16/2025 vp, p. 288.

- another limited liability company solely owned by a member of the board of the limited liability company that is the applicant
- a sister company owned by the parent company of the limited liability company that is the applicant

The list is for informational purposes only. The application shall also include information on other companies or entities that are directly or indirectly linked to the applicant for authorisation.

The name and identification details of the affiliated companies and entities will be provided in the application. The identification data of a company or a corporation refers to the business identity code (Y-code) for legal persons registered in Finland and the value added tax number (VAT-code) for legal persons registered outside Finland or other similar identification data.

According to section 10(4) of the Gambling Act, the reliability and suitability of companies and entities directly or indirectly connected to the licence applicant may also be taken into account in the licence assessment. The supervisory authority may, if necessary, request that the application be supplemented by the submission of information and reports describing the undertakings and entities concerned and their compliance with their obligations.

### **Information on the duration of the licence applied for**

The application shall state the period for which the licence is applied for. On the basis of section 14(1) of the Gambling Act, an exclusive licence is always granted for a period of ten years at a time.

### **Report on the types of gambling activities the applicant intends to organise**

The application will indicate the intended forms of gambling, i.e. which of the different forms of gambling the applicant would operate. Under section 5(1) of the Gambling Act, an exclusive licence may be granted, subject to the conditions laid down by law, for the following forms of implementation:

- cash lotteries and betting games
- slot machines and casino games

Separate licences for the implementation modes mentioned above will be applied for and granted. Thus, there may be no more than two exclusive licences.

### **Information about the gambling software supplier**

The application shall include the name and identification details of the gambling software supplier to be used, as well as the name and contact details of the contact person. The unique identifier of the gambling software supplier is the Y-identifier for legal persons registered in Finland and the VAT identification number (VAT identification number) or other equivalent unique identifier for legal persons registered abroad. In the case of a natural person, the personal identification number or date of birth (preferably personal

identification number) is given as the identifying information. In addition, the application shall indicate the name and contact details of the natural person acting as contact person on behalf of the game software supplier. Contact details will be indicated with an email address and a telephone number.

According to section 33 of the Gambling Act, only gambling software manufactured, supplied, installed or adapted by gambling software suppliers with a licence to provide gambling software referred to in section 7 of the Act may be used in the provision of gambling.

However, in accordance with the transitional provisions under section 106 of the Gambling Act, gambling software licences may only be applied for from 1 January 2027 and the provisions of Section 33 of the Act shall not apply to gambling software licences until 1 January 2028.

### **Report on gambling marketing**

The application provides a free-form written explanation of where and how gambling is intended to be marketed. The application must indicate at least the main marketing methods and channels, such as website advertising, sponsorship, television, radio, print media, social media, outdoor advertising and advertising at events.

The application must identify all brand names used in the marketing. Brand name refers to the brand names used by the applicant for the licence, not to the names of individual games of chance. In order to assess the direction of control measures, it is necessary for the control authority to have correct and up-to-date information on the planned marketing of gambling and the brand names to be used.

The application must also describe the means or principles by which the applicant seeks to protect minors and other vulnerable persons from gambling marketing. With this report, the applicant demonstrates that he is aware of the obligations under the Gambling Act on the prevention and reduction of the harm from gambling, in particular with regard to minors and vulnerable persons.

A statement of the planned marketing can be provided either directly in the application or in a separate supporting document.

### **Report on procedures and number of trained personnel for handling disagreements, complaints and other issues**

The application will provide a free-form written explanation of the applicant's procedures for handling disagreements, complaints and other issues concerning gambling. The application also indicates the number of persons trained and employed in these posts. An explanation of the procedures and information on the number of staff may be provided either directly in the application or in a separate supporting document.

According to section 49 of the Gambling Act, the licence holder should have procedures and the necessary number of trained personnel to handle disputes, complaints and other issues related to the gambling services offered. The holder of a licence shall respond to

contacts from a player within a reasonable period of time and provide a written response at the player's request. In addition, the licence holder shall process the player's request for payment of winnings that includes the player's contact and give his views on it. The opinion shall include the grounds for the payment of winnings or, alternatively, the grounds for refusing the payment of winnings.

### **Report on measures to detect and prevent competitive manipulation**

The application shall provide a free-form written explanation of the measures planned by the applicant to detect and prevent competition manipulation. Measures to combat manipulation of competitions could be related to, for example, betting market selection, risk management methods and national and international cooperation in the fight against manipulation. An explanation of the measures envisaged may be provided either directly by means of an application or by means of a separate supporting document.

According to section 48 of the Gambling Act, the licence holder must have procedures in place to detect and prevent breaches of the provisions governing the organisation of gambling, breaches of the terms of the agreement between the licence holder and the player, breaches of the game rules, and competition manipulation. In addition, according to that provision, the licence holder must have procedures enabling players of gambling games to report these facts immediately to the licence holder.

### **Report on compliance with regulatory obligations to combat money laundering and terrorist financing**

The application provides a free-form written explanation of how the applicant intends to comply with the regulatory obligations under the Money Laundering Act (444/2017) to combat money laundering and terrorist financing. The report should describe how the applicant intends to fulfil the following obligations:

- customer due diligence (chapter 3 of the Money Laundering Act)
- the duty to report and notify (chapter 4 of the Money Laundering Act)
- the risk assessment and risk management methods of the obliged entity under the Money Laundering Act (chapter 2, section 3 of the Money Laundering Act)

A report on the planned implementation of the obligations may be provided either directly by means of an application or in a separate supporting document. In the report, the applicant must assess the size, nature and scope of its proposed activities and their impact on money laundering risks. The report demonstrates the applicant's understanding of the obligations under the Money Laundering Act and the specific risks associated with the industry and the Finnish operating environment.

### **Method of transmission of the decision**

The application will indicate the address to which the decision will be delivered.

### **Consent to e-filing**

With an application, you can give your consent to electronic transactions. In this case, the decision on the application and the letters, requests for clarification and other documents from the authority relating to the application and the licence granted will be sent electronically.

#### 4.3 Annexes to the application

The other information and reports referred to in subsections 2 and 3 of section 11 of the Gambling Act shall be submitted as separate supporting documents. The supervisory authority will assess, on the basis of information and reports, whether the applicant for an exclusive licence and its owners and management meet the requirements of reliability and suitability laid down in section 10 of the Act. Where appropriate, the assessment shall also be carried out in respect of enterprises and entities directly or indirectly linked to the applicant. On the basis of the information and studies, the direction of future control measures will also be assessed.

In connection with the assessment of the licence, the Authority will check the applicant legal person's criminal record against the Community Fines Notice and request the applicant to submit a report on the management of obligations pursuant to Section 5 of the Grey Economy Clearing House Act (1207/2010). In addition, the supervisory authority may, where necessary, request a report on the fulfilment of obligations and also check information from the extract of the corporate fine register in respect of companies and entities connected to the applicant, provided that they are operators registered in Finland. For linked enterprises and entities registered abroad, information and reports proving reliability and suitability will be requested separately, if necessary.

The following information and explanations shall be provided as an annex to the application, in the form of separate attached documents:

##### **Receipt for the processing fee**

The application is accompanied by a receipt or other proof of payment of the licence application processing fee.

## **Authorisation to register a legal person**

If the person signing the application does not have a direct right to sign the articles of association or statutes, a power of attorney issued to that person for the purpose of applying for authorisation shall be attached to the application.

The power of attorney must be signed. The power of attorney can be signed either physically or electronically. The electronic signature shall be at least equivalent to an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

## **The articles of association or other description of the purpose of the applicant's activities**

The application shall be accompanied by the articles of association of the applicant for the exclusive concession. Alternatively, the application may be accompanied by a free-form statement describing the purpose of the applicant's activities in a manner consistent with the articles of association.

## **Information on the applicant's financial conditions**

The application is accompanied by the latest approved financial statements, which should include the profit and loss account, the balance sheet and the explanatory notes. In addition, a financial calculation will be submitted if the applicant for the operating licence is obliged to draw up it.

The financial statements shall present comparative information from the profit and loss statement, balance sheet and, if applicable, financial statement for the previous financial year. The auditor's report on the financial statements is annexed to the financial statements. In addition, accounting and material schedules and balance sheet breakdowns detailing the content of the accounts are provided in an annex.

## **Description of the applicant's activities**

The application shall be accompanied by the applicant's most recent activity report, provided that it adequately reflects the nature of the applicant's activities. Alternatively, a free-form written statement describing the applicant's activity may be submitted as an annex to the application.

## **Information on the agents used by the applicant**

Information on the agents employed by the applicant is provided as an annex to the application. According to section 4(1)(11) of the Gambling Act, an agent is a trader or an entity that receives payments or transfers winnings in connection with gambling or provides premises for the use of gambling machines or lottery machines.

The attached document shall indicate, for each agent, the name, business ID, postal address and contact details of the trader, undertaking or entity acting as agent. The contact details of the contact person shall be given in the telephone number and email address.

## 5 Applying for a gambling licence

### 5.1 Conditions for granting a gambling licence

According to section 9 of the Gambling Act, a gambling licence may be granted a natural or legal person referred to in section 2, subsection 1 or section 3, subsections 1 or 2 of the Enterprise Act (565/2023), if it can be ascertained on the basis of the information received that the applicant and its owners and management meet the requirements for reliability and suitability laid down in section 10.

According to section 6, subsection 3 of the Gambling Act, a gambling licence may not be granted to an exclusive licence holder referred to in section 5 of the Act.

According to section 57 of the Gambling Act, the licence is granted by the licensing and supervisory authority, which acts as the supervisory authority. According to section 106 of the Act, the National Police Board shall act as the competent authority referred to in section 57 until 31 December 2026.

### 5.2 Information to be provided in the application

The information and reports to be included in an application for a gambling licence are laid down in section 11, subsections 2 and 3 of the Gambling Act. The following information and explanations will in principle be provided directly in the application:

#### **Name of the applicant**

The name of the applicant means the name of the legal person or the name of the natural person who is the applicant.

#### **Identification data of the applicant**

The applicant's identification data refers to the company and entity identification number (Y-identifier) for legal persons registered in Finland and the value added tax identification number (VAT identification number) or other equivalent identification data for legal persons registered abroad. If the applicant is a natural person, the personal identification number or date of birth (preferably personal identification number) is given as the identification data.

If the applicant for a gambling licence is a natural person or a legal person registered abroad who does not yet have a Finnish business and company identification number at the application stage, it must be submitted to the supervisory authority afterwards. The business ID code is mandatory for licence holders for the payment of the lottery tax, and according to section 16 of the Gambling Act, the ID must be submitted to the supervisory authority no later than three months after the start of the gambling activity.

#### **Contact details of the applicant**

The application shall contain the contact details of the legal or natural person applying for authorisation. Contact details refer to postal address, e-mail address and telephone number.

### **Names and contact details of contact persons**

If the applicant for the licence is a legal person, the application shall indicate the name and contact details of the natural person acting as the applicant's contact person for the processing of the application for the licence, as well as the name and contact details of the natural person acting as the contact person for technical matters. Contact details will be indicated with an email address and a telephone number.

The application may also include details of other possible contact persons if the applicant has different contact persons for different matters. In the application form, information on other contact persons, if any, may be provided, for example, in the section dedicated to additional information.

### **Legal form of the applicant**

The application shall indicate the legal form of the applicant for the licence, such as, for example, the form of a company.

### **Details describing the ownership and management relationships of the organisation**

If the applicant is a legal person, the application shall include information on the members and deputy members of the board of directors of the applicant legal person, the major shareholders and the natural persons who are members of the executive management. If the applicant for a licence is a natural person, the application will provide information on said person in a manner similar to the information on the aforementioned responsible persons of the applicant legal entity. In addition, where necessary, the person concerned will be subject to a clearance of trustworthiness and suitability in the same way as the responsible persons of the legal person applying for the authorisation. For further details on the information and statements to be provided on natural persons, see chapter 3 of this regulation (see "Statement on the persons responsible for and significant owners of the applicant for a licence", sections 3.1, 3.2 and 3.3).

In addition, the application for authorisation shall include information about the enterprises and entities that are directly or indirectly linked to the applicant. Companies and associations directly or indirectly related to the applicant include at least<sup>2</sup>:

- a public limited company which is partly or wholly owned by the applicant company or entity (at least 25% of the shares must be relevant)
- a limited liability company that is a partner in a general partnership applying for a licence.
- any company or entity linked to the applicant company or entity through its responsible person or through another company or entity;

<sup>2</sup> Government proposal HE 16/2025 vp, p. 288.

- another limited liability company solely owned by a member of the board of the limited liability company that is the applicant.
- a sister company owned by the parent company of the limited liability company that is the applicant.
- a company or entity in which the natural person applying has acted or is acting as a responsible officer.
- a company or entity directly or indirectly connected to the applicant natural person's immediate business or corporate relationships, such as a parent company whose subsidiary's board includes the applicant natural person.

The list is for informational purposes only. The application shall also include information on other companies or entities that are directly or indirectly linked to the applicant for authorisation.

The name and identification details of the affiliated companies and entities will be provided in the application. The identification data of a company or a corporation refers to the business identity code (Y-code) for legal persons registered in Finland and the value added tax number (VAT-code) for legal persons registered outside Finland or other similar identification data.

According to section 10(4) of the Gambling Act, the reliability and suitability of companies and entities directly or indirectly connected to the licence applicant may also be taken into account in the licence assessment. The supervisory authority may, if necessary, request that the application be supplemented by the submission of information and reports describing the undertakings and entities concerned and their compliance with their obligations.

### **Information on the duration of the licence applied for**

The application shall state the period for which the licence is applied for. According to section 14(2) of the Gambling Act, a licence for gambling activities is granted for a maximum period of five years at a time. Depending on the application, the length of the gambling licence is five years or a shorter period.

### **Report on the types of gambling activities the applicant intends to organise**

It is possible to grant a licence to operate gambling games either for one or more modes of operation of gambling games. When submitting the application, the applicant for a gambling licence chooses the number of different forms of implementation to which the licence is applied for. A licence for the operation of a gambling game for several different modes of implementation can be applied for by means of one joint application or several separate applications.

The application will indicate the intended forms of gambling, i.e. which of the different forms of gambling the applicant would operate. According to section 6(1) of the Gambling Act, a gambling licence may be granted for the following forms of implementation under the conditions laid down in the Act:

- fixed-factor betting
- variable odds betting
- virtual betting
- online casino games
- electronic money bingo
- electronic cash machine games

The applicant for a gambling licence shall determine the number of different forms of implementation to which the licence is applied for, and whether a licence for several different forms of implementation is applied for by means of one joint application or several separate applications. Each individual application shall be subject to its own handling fee.

### **Information about the gambling software supplier**

The application shall include the name and identification details of the gambling software supplier to be used, as well as the name and contact details of the contact person. The identifying data of the gambling software provider refers to the business ID for legal persons registered in Finland and the value added tax (VAT) number or other similar identifying data for legal persons registered outside Finland. In the case of a natural person, the personal identification number or date of birth (preferably personal identification number) is given as the identifying information. In addition, the application shall indicate the name and contact details of a natural person acting as the contact person for the game software supplier. Contact details will be indicated with an email address and a telephone number.

According to section 33 of the Gambling Act, only gambling software manufactured, supplied, installed or adapted by gambling software suppliers with a licence to provide gambling software referred to in section 7 of the Act may be used in the provision of gambling.

However, in accordance with the transitional provisions under Section 106 of the Gambling Act, gambling software licences may only be applied for from 1 January 2027 and the provisions of Section 33 of the Act shall not apply to gambling software licences until 1 January 2028.

### **Report on gambling marketing**

The application provides a free-form written explanation of where and how gambling is intended to be marketed. The application must indicate at least the main marketing methods and channels, such as website advertising, sponsorship, television, radio, print media, social media, outdoor advertising and advertising at events.

The application must identify all brand names used in the marketing. Brand name refers to the brand names used by the applicant for the licence, not to the names of individual games of chance. In order to assess the direction of control measures, it is necessary for

the control authority to have correct and up-to-date information on the planned marketing of gambling and the brand names to be used.

The application must also describe the means or principles by which the applicant seeks to protect minors and other vulnerable persons from gambling marketing. With this report, the applicant demonstrates that he is aware of the obligations under the Gambling Act on the prevention and reduction of the harm from gambling, in particular with regard to minors and vulnerable persons.

A statement of the planned marketing can be provided either directly in the application or in a separate supporting document.

### **Report on procedures and number of trained personnel for handling disagreements, complaints and other issues**

The application will provide a free-form written explanation of the applicant's procedures for handling disagreements, complaints and other issues concerning gambling. The application also indicates the number of persons trained and employed in these posts. An explanation of the procedures and information on the number of staff may be provided either directly in the application or in a separate supporting document.

According to section 49 of the Gambling Act, the licence holder should have procedures and the necessary number of trained personnel to handle disputes, complaints and other issues related to the gambling services offered. The holder of a licence shall respond to contacts from a player within a reasonable period of time and provide a written response at the player's request. In addition, the licence holder shall process the player's request for payment of winnings that includes the player's contact and give his views on it. The opinion shall include the grounds for the payment of winnings or, alternatively, the grounds for refusing the payment of winnings.

### **Report on measures to detect and prevent competitive manipulation**

The application provides a free-form explanation of the measures planned by the applicant to detect and prevent competition manipulation. The report may describe the measures envisaged by the applicant, for example in terms of target selection and risk management methods for betting, as well as its involvement in national and international co-operation to combat manipulation. An explanation of the measures envisaged may be provided either directly by means of an application or by means of a separate supporting document.

According to section 48 of the Gambling Act, the licence holder must have procedures in place to detect and prevent breaches of the provisions governing the organisation of gambling, breaches of the terms of the agreement between the licence holder and the player, breaches of the game rules, and competition manipulation. In addition, according to that provision, the licence holder must have procedures enabling players of gambling games to report these facts immediately to the licence holder.

## **Report on compliance with regulatory obligations to combat money laundering and terrorist financing**

The application provides a free-form written explanation of how the applicant intends to comply with its regulatory obligations under the Money Laundering Act to combat money laundering and terrorist financing. The report should describe how the applicant intends to fulfil the following obligations:

- customer due diligence (chapter 3 of the Money Laundering Act)
- the duty to report and notify (chapter 4 of the Money Laundering Act)
- the risk assessment and risk management methods of the obliged entity under the Money Laundering Act (chapter 2, section 3 of the Money Laundering Act)

A report on the planned implementation of the obligations may be provided either directly by means of an application or in a separate supporting document. In the report, the applicant must assess the size, nature and scope of its proposed activities and their impact on money laundering risks. The report demonstrates the applicant's understanding of the obligations under the Money Laundering Act and the specific risks associated with the industry and the Finnish operating environment.

### **Method of transmission of the decision**

The application will indicate the address to which the decision will be delivered.

### **Consent to e-filing**

With an application, you can give your consent to electronic transactions. In this case, the decision on the application and the letters, requests for clarification and other documents from the authority relating to the application and the licence granted will be sent electronically.

## **5.3 Annexes to the application for all gambling licence applicants**

The granting of a gambling licence is subject to the condition that the applicant and its owners and management meet the conditions for reliability and suitability laid down in section 10 of the Gambling Act. In order to assess the credibility and suitability of the application, it must be accompanied by sufficient information on the applicant and the applicant's financial standing, if not already available to the authority. The supervisory authority will assess, on the basis of the information and explanations provided, whether the applicant for a gambling licence fulfils the conditions for granting a licence laid down in section 10 of the Act. In addition, the orientation of future control measures will be assessed on the basis of the data and reports.

The extent of the information required in the annexes to the application for authorisation shall be determined by the status of the applicant. When the applicant for a licence is a natural person with a Finnish personal identity code or a legal person registered in Finland, the supervisory authority requests the applicant to submit a report on the management of obligations as referred to in Section 5 of the Act on the Grey Economy Informa-

tion Unit. In addition, the supervisory authority may check the details of the applicants concerned in the register of fines or criminal records or in the collective fine extract to be extracted from the criminal record. On the other hand, if the applicant for a licence is a legal person or a natural person registered outside Finland who does not have a Finnish personal identification number, the applicant must submit to the supervisory authority the corresponding information and explanations demonstrating reliability and suitability by self-employed means. These are, in practice, annexes that provide information on the applicant and their integrity and compliance management. The content of these annexes is described in more detail in section 3.3 of this regulation for natural persons and in section 5.4 of this regulation for legal persons.

Where necessary, the reliability and suitability assessment shall also be carried out in respect of enterprises and entities directly or indirectly linked to the applicant. The supervisory authority may request a report on the fulfilment of obligations and check the information in the criminal record in the collective fines database also for companies and entities linked to the applicant, if they are registered in Finland. For linked enterprises and entities registered abroad, information and reports proving reliability and suitability will be requested separately, if necessary.

Some of the information needed to process an application for a permit is not fully available to the supervisory authority, even if the person concerned is a legal person registered in Finland or a natural person with a Finnish personal identity code. In this case, all licence applicants shall attach this information to the application on their own initiative.

The following information and supporting documents referred to in section 11(2) and (3) of the Gambling Act shall be attached to the application on its own initiative, regardless of the country of registration or personal ID of the applicant for the operating licence. The data and reports shall be submitted as separate supporting documents:

### **Authorisation to register a legal person**

If the person signing the application does not have a direct right to sign the articles of association or statutes, a power of attorney issued to that person for the purpose of applying for authorisation shall be attached to the application.

The power of attorney must be signed. The power of attorney can be signed either physically or electronically. The electronic signature shall be at least equivalent to an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

### **Articles of association, rules or other description of the purpose of the activities of the applicant**

If the applicant is a legal person, the articles of association or statutes of the applicant must be submitted with the application. Alternatively, the application may be accompanied by a free-form statement describing the purpose of the applicant's activities in a manner consistent with the articles of association or bylaws. If the licence applicant is a natural person, a free-form description of the purpose of the applicant's activities shall be provided.

## **Information on the applicant's financial conditions**

The application is accompanied by the latest approved financial statements, which should include the profit and loss account, the balance sheet and the explanatory notes. In addition, a financial calculation will be submitted if the applicant for the operating licence is obliged to draw up it. The financial statements shall present comparative information from the profit and loss statement, balance sheet and, if applicable, financial statement for the previous financial year. The auditor's audit report on the financial statements or the performance audit report of the performance auditor shall be annexed to the financial statements. In addition, the accounting and material lists as well as balance sheet specifications specifying the content of the accounts are submitted as annexes to the financial statements.

If the applicant entity does not have an approved set of financial statements, the application must be accompanied by other equivalent evidence of the applicant's financial situation. Such a statement may be, for example, a financial calculation or financing plan that provides a sufficient picture of the economic activity. On the basis of the information provided, it must be possible to assess the applicant's financial situation. The reports shall include at least information on the estimated turnover, the equity capital used, the debt capital used, broken down into short-term and long-term debt capital, and on significant agreements affecting the applicant's financial position.

The natural person applying for a licence shall attach to the application a business plan for the gambling activities for the coming year. In addition, information on the applicant's financial situation shall be attached to the application. In order to assess the financial situation, the application must be accompanied by at least information on the personal assets and the assets comprising, the revenue accepted for tax purposes for the previous year, liabilities and significant agreements affecting the financial position of the person.

## **Description of the applicant's activities**

The application shall be accompanied by the applicant's most recent activity report, provided that it adequately reflects the nature of the applicant's activities. Alternatively, a free narrative describing the applicant's activities may be submitted as an annex to the application.

## **Information on the agents used by the applicant**

Information on the agents employed by the applicant is provided as an annex to the application. According to section 4(1)(11) of the Gambling Act, an agent is a trader or an entity that receives payments or transfers winnings in connection with gambling or provides premises for the use of gambling machines or lottery machines. For each agent, the supporting document shall indicate the name, business ID, postal address and the name and contact details of the trader or entity acting as an agent. The contact details of the contact person shall be given in the telephone number and email address.

## 5.4 Annexes to the application for a gambling licence to applicants registered outside Finland

The following information and reports referred to in paragraphs 2 and 3 of Section 11 of the Gambling Act shall be submitted if the applicant for a licence is a legal person not registered in Finland. The data and reports shall be submitted as separate supporting documents:

### **Extract from the Register of Trades, Associations or Foundations**

An extract from the Trade, Associations or Foundations Register or any other corresponding certificate indicating who has the right to sign on behalf of the company or organisation is submitted as an annex to the application. This document certifies that the decision to apply for a licence has been taken in accordance with the rules of the applicant undertaking or body and that the person signing the application has the right to sign for the applicant.

### **Proof of the applicant's criminal record**

Under section 10(2)(1) of the Gambling Act, when assessing the applicant's reliability and suitability, account must be taken of whether the applicant has been sentenced to a corporate fine in the preceding five years for an offence which may be considered to be manifestly inappropriate to operate games of chance or to manufacture, supply, install or adapt gambling software used for the execution of gambling.

For the purposes of assessing the above question, the application must be accompanied by a criminal record, a summary conviction certificate or an equivalent certificate stating whether the applicant has been convicted of a criminal offence within the five years preceding the submission of the licence application.

### **Certificates of compliance with the applicant's obligations**

In the light of section 10(2)(2) to (5) of the Gambling Act, when assessing the applicant's reliability and suitability, account must be taken of the following:

- whether the applicant is bankrupt or whether the applicant is financially capable of managing his/her affairs and meeting his/her legal obligations
- whether the applicant has more than minor debts in relation to his solvency to be recovered by way of enforcement or debts returned from seizure by means of certificates of insolvency impediment
- whether the applicant has, or has had in the current year or in the preceding three calendar years, repeated or significant failures to fulfil their obligations relating to taxes or statutory payments;
- whether the applicant has been made subject to a business prohibition or a temporary business prohibition

For the assessment of the above-mentioned issues, documentation describing the applicant's compliance with obligations must be submitted as an annex to the application.

The certificates must contain sufficient information on the applicant's compliance with its obligations to ensure that the conditions for granting the permit are met. Evidence of compliance may include, for example:

- proof of the applicant's tax debt situation
- a certificate of the applicant's enforcement status
- proof of the applicant's disqualification from business;

The applicant may also prove his/her reliability and suitability with regard to the issues referred to in paragraphs 2-5 of subsection 2 of Section 10 of the Gambling Act by means of other certificates, registration excerpts or similar official documents.

Any reliability and suitability documents of the authorities, such as certificates and extracts from registers, that are submitted as an annex to the application must indicate the name and contact details of the authority that prepared the document. The annexes shall be up-to-date. Documents up to six months old from the date of the application are considered to be up-to-date, provided that the information has not changed since the date of the document. The applicant is responsible for the accuracy and timeliness of the annexes.

## 5.5 Representative of the applicant established outside the European Economic Area

The application for authorisation shall include information on the applicant's representative if the applicant is established outside the European Economic Area. Under section 12(1) of the Gambling Act, the licence holder must have a representative domiciled in a Member State of the European Economic Area if the legal person applying for the licence is not established in a Member State of the European Economic Area or if the applicant natural person is not resident in a Member State of the European Economic Area. According to section 12(2) of the Act, the licence holder shall authorise the representative to represent the licence holder in the Finnish authorities in all matters related to the activities covered by the licence, to act on behalf of the licence holder and to receive a summons against the licence holder and to exercise the right to speak themselves or through someone else.

The representative referred to in section 12 of the Gambling Act must also satisfy the conditions of reliability and suitability laid down in section 10 of the Act. In order to assess whether these conditions are met, the information provided for in article 11(2) of the Gambling Act must also be provided in the application for a licence in respect of the representative.

Depending on whether the representative is a natural person or a legal person, the following information will be provided directly on the application in the same way as the information on the responsible persons of applicants and natural persons applying for a li-

cence (see section 3.2 of this regulation) or the information on the legal person applying for a gambling licence (see section 5.2 of this regulation):

- representative's name
- identification of the representative
- Contact details of the representative
- Contact person's name and contact details
- Legal form of the representative
- Details describing the ownership and management relationships of the organisation

The following information and statements shall be submitted in the same way as the corresponding information and statements of the legal or natural person applying for a gambling licence as separate supporting documents (see section 5.3 of this regulation):

- Articles of association, statutes of the representative or other description of the purpose of the representative's activities
- Information on the financial situation of the representative
- Description of the representative's activities

If the representative is a legal person registered elsewhere than in Finland or a natural person who does not have a Finnish personal identification number, the following information and explanations must also be provided in the application:

- As representative, extract from the criminal record of a natural person
- Evidence of the fulfilment of the obligations of the natural person acting as representative
- Certificates of criminal record and compliance management by the legal entity acting as representative
- A criminal record extract of the significant owner and of the members of the executive management of the legal person acting as representative.
- Certificates on the performance of significant owner and executive management obligations of the legal entity acting as a proxy

The aforementioned data and reports shall be submitted in a similar manner as separate supporting documents as the corresponding data and reports of the legal person applying for a gambling licence (see section 5.4 of this regulation) or the corresponding data and reports of the responsible persons of the applicant for a licence (see section 3.3 of this regulation).

In addition, the authorisation referred to in section 12(2) of the Gambling Act is submitted as an annex to the application. The document in question authorises the representative to represent the holder of the gambling licence before the Finnish authorities in all matters related to the licensed activities, to act on behalf of the licence holder, to receive service of process against the licence holder, and to exercise the right of audience either

personally or through another person. The authorisation must be signed. The authorisation can be signed either physically or electronically. The electronic signature shall be at least equivalent to an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

## 6 Applying for a gambling software licence

### 6.1 Conditions for granting a gambling software licence

According to section 9 of the Gambling Act, a gambling software licence shall be granted to a natural or legal person referred to in section 2, subsection 1 or section 3, subsections 1 or 2 of the Business Act (565/2023), if it can be ascertained on the basis of the information received that the applicant and its owners and management meet the requirements for reliability and suitability laid down in section 10.

According to section 57 of the Gambling Act, the licence is granted by the licensing and supervisory authority, which acts as the supervisory authority. According to section 106 of the Act, the National Police Board shall act as the competent authority referred to in section 57 until 31 December 2026.

### 6.2 Information to be provided in the application

The information and explanations to be included in the application for a gambling software licence are set out in section 11(2) of the Gambling Act. The following information and explanations will in principle be provided directly in the application:

#### **Name of the applicant**

The name of the applicant means the name of the legal person or the name of the natural person who is the applicant.

#### **Identification data of the applicant**

The applicant's identification data means the Y-identifier for legal persons registered in Finland and the VAT identification number (VAT number) or other equivalent identification data for legal persons registered abroad. If the applicant is a natural person, the personal identification number or date of birth (preferably personal identification number) is given as the identification data.

#### **Contact details of the applicant**

The application shall contain the contact details of the legal or natural person applying for authorisation. Contact details refer to postal address, e-mail address and telephone number.

#### **Names and contact details of contact persons**

If the applicant for the licence is a legal person, the application shall indicate the name and contact details of the natural person acting as the applicant's contact person for the

processing of the application for the licence, as well as the name and contact details of the natural person acting as the contact person for technical matters. Contact details will be indicated with an email address and a telephone number.

The application may also include details of other possible contact persons if the applicant has different contact persons for different matters. In the application form, information on other contact persons, if any, may be provided, for example, in the section dedicated to additional information.

### **Legal form of the applicant**

The application shall indicate the legal form of the applicant for the licence, such as, for example, the form of a company.

### **Details describing the ownership and management relationships of the organisation**

If the applicant is a legal person, the application shall include information on the members and deputy members of the board of directors of the applicant legal person, the major shareholders and the natural persons who are members of the executive management. If the applicant for a licence is a natural person, the application will provide information on said person in a manner similar to the information on the aforementioned responsible persons of the applicant legal entity. In addition, where necessary, the person concerned will be subject to a clearance of trustworthiness and suitability in the same way as the responsible persons of the legal person applying for the authorisation. For further details on the information and statements to be provided on natural persons, see chapter 3 of this regulation (see "Statement on the persons responsible for and significant owners of the applicant for a licence", sections 3.1, 3.2 and 3.3).

In addition, the application for authorisation shall include information about the enterprises and entities that are directly or indirectly linked to the applicant. Companies and associations directly or indirectly related to the applicant include at least<sup>3</sup>:

- a public limited company which is partly or wholly owned by the applicant company or entity (at least 25% of the shares must be relevant)
- a limited liability company that is a partner in a general partnership applying for a licence
- any company or entity linked to the applicant company or entity through its responsible person or through another company or entity
- another limited liability company solely owned by a member of the board of the limited liability company that is the applicant
- a sister company owned by the parent company of the limited liability company that is the applicant
- a company or entity in which the natural person applying has acted or is acting as a responsible officer

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<sup>3</sup> Government proposal HE 16/2025 vp, p. 288.

- a company or entity directly or indirectly connected to the applicant natural person's immediate business or corporate relationships, such as a parent company whose subsidiary's board includes the applicant natural person

The list is for informational purposes only. The application shall also include information on other companies or entities that are directly or indirectly linked to the applicant for authorisation.

The name and identification details of the affiliated companies and entities will be provided in the application. The identification data of a company or a corporation refers to the business identity code (Y-code) for legal persons registered in Finland and the value added tax number (VAT-code) for legal persons registered outside Finland or other similar identification data.

According to Section 10(4) of the Gambling Act, the reliability and suitability of companies and entities directly or indirectly connected to the licence applicant may also be taken into account in the licence assessment. The supervisory authority may, if necessary, request that the application be supplemented by the submission of information and reports describing the undertakings and entities concerned and their compliance with their obligations.

#### **Information on the duration of the licence applied for**

The application shall state the period for which the licence is applied for. Under section 14(2) of the Gambling Act, a licence for gambling software is granted for a maximum period of five years at a time. Depending on the application, the length of the operating licence is five years or a shorter period.

#### **Method of transmission of the decision**

The application will indicate the address to which the decision will be delivered.

#### **Consent to e-filing**

With an application, you can give your consent to electronic transactions. In this case, the decision on the application and the letters, requests for clarification and other documents from the authority relating to the application and the licence granted will be sent electronically.

### **6.3 Application attachments for all applicants for a gambling software licence**

The granting of a gambling software licence is subject to the condition that the applicant and its owners and management meet the conditions for reliability and suitability laid down in section 10 of the Gambling Act. In order to assess the credibility and suitability of the application, it must be accompanied by sufficient information on the applicant and the applicant's financial standing, if not already available to the authority. The supervisory authority shall assess, on the basis of information and studies, whether the applicant for a licence fulfils the conditions for granting the authorisation laid down in section

10 of the Act. In addition, the orientation of future control measures will be assessed on the basis of the data and reports.

The extent of the information required in the annexes to the application for authorisation shall be determined by the status of the applicant. When the applicant for a licence is a natural person with a Finnish personal identity code or a legal person registered in Finland, the supervisory authority requests the applicant to submit a report on the management of obligations as referred to in Section 5 of the Act on the Grey Economy Information Unit. In addition, the supervisory authority may check the details of the applicants concerned in the register of fines or criminal records or in the collective fine extract to be extracted from the criminal record. On the other hand, if the applicant for a licence is a legal person or a natural person registered outside Finland who does not have a Finnish personal identification number, the applicant must submit to the supervisory authority the corresponding information and explanations demonstrating reliability and suitability by self-employed means. These are, in practice, annexes that provide information on the applicant, as well as on their integrity and compliance record. The content of these annexes is described in more detail in section 3.3 of this regulation for natural persons and in section 5.4 of this regulation for legal persons.

Where necessary, the reliability and suitability assessment shall also be carried out in respect of enterprises and entities directly or indirectly linked to the applicant. The authority may also request a report on the fulfilment of obligations and check information from the criminal record for companies and entities linked to the applicant, if they are registered in Finland. For linked enterprises and entities registered abroad, information and reports proving reliability and suitability will be requested separately, if necessary.

Some of the information needed to process an application for a permit is not fully available to the supervisory authority, even if the person concerned is a legal person registered in Finland or a natural person with a Finnish personal identity code. In this case, all licence applicants shall attach this information to the application on their own initiative.

The following information and supporting documents referred to in section 11(2) of the Gambling Act shall be attached to the application on their own initiative, regardless of the country of registration or personal ID of the applicant for the operating licence. The data and reports shall be submitted as separate supporting documents:

#### **Authorisation to register a legal person**

If the person signing the application does not have a direct right to sign the articles of association or statutes, a power of attorney issued to that person for the purpose of applying for authorisation shall be attached to the application.

The power of attorney must be signed. The power of attorney can be signed either physically or electronically. The electronic signature shall be at least equivalent to an advanced electronic signature in accordance with the eIDAS Regulation (EU 910/2014).

#### **Articles of association, rules or other description of the purpose of the activities of the applicant**

If the applicant is a legal person, the articles of association or statutes of the applicant must be submitted with the application. Alternatively, the application may be accompanied by a free-form statement describing the purpose of the applicant's activities in a manner consistent with the articles of association or bylaws. If the licence applicant is a natural person, a free-form description of the purpose of the applicant's activities shall be provided.

### **Information on the applicant's financial conditions**

The application is accompanied by the latest approved financial statements, which should include the profit and loss account, the balance sheet and the explanatory notes. In addition, a financial calculation will be submitted if the applicant for the operating licence is obliged to draw up it. The financial statements shall present comparative information from the profit and loss statement, balance sheet and, if applicable, financial statement for the previous financial year. The auditor's audit report on the financial statements or the performance audit report of the performance auditor shall be annexed to the financial statements. In addition, the accounting and material lists as well as balance sheet specifications specifying the content of the accounts are submitted as annexes to the financial statements.

If the applicant entity does not have an approved set of financial statements, the application must be accompanied by other equivalent evidence of the applicant's financial situation. Such a statement may be, for example, a financial calculation or financing plan that provides a sufficient picture of the economic activity. On the basis of the information provided, it must be possible to assess the applicant's financial situation. The reports shall include at least information on the estimated turnover, the equity capital used, the debt capital used, broken down into short-term and long-term debt capital, and on significant agreements affecting the applicant's financial position.

The natural person applying for a licence shall attach to the application a business plan for the gambling activities for the coming year. In addition, information on the applicant's financial situation shall be attached to the application. In order to assess the financial situation, the application must be accompanied by at least information on the personal assets and the assets comprising, the revenue accepted for tax purposes for the previous year, liabilities and significant agreements affecting the financial position of the person.

### **Description of the applicant's activities**

The application shall be accompanied by the applicant's most recent activity report, provided that it adequately reflects the nature of the applicant's activities. Alternatively, a free narrative describing the applicant's activities may be submitted as an annex to the application.

## 6.4 Attachments to the application for a gambling software licence to applicants registered abroad

The following information and reports referred to in section 11(2) of the Gambling Act shall be submitted if the applicant for the licence is a legal person not registered in Finland. The data and reports shall be submitted as separate supporting documents:

### **Extract from the Register of Trades, Associations or Foundations**

An extract from the Trade, Associations or Foundations Register or any other equivalent certificate indicating who has the right to sign on behalf of the company or organisation shall be submitted as an annex to the application. This document certifies that the decision to apply for a licence has been taken in accordance with the rules of the applicant undertaking or body and that the person signing the application has the right to sign for the applicant.

### **Proof of the applicant's criminal record**

Under section 10(2)(1) of the Gambling Act, when assessing the applicant's reliability and suitability, account must be taken of whether the applicant has been sentenced to a corporate fine in the preceding five years for an offence which may be considered to be manifestly inappropriate to operate games of chance or to manufacture, supply, install or adapt gambling software used for the execution of gambling.

For the purposes of assessing the above question, the application must be accompanied by a criminal record, a summary conviction certificate or an equivalent certificate stating whether the applicant has been convicted of a criminal offence within the five years preceding the submission of the licence application.

### **Certificates of compliance with the applicant's obligations**

In the light of section 10(2)(2) to (5) of the Gambling Act, when assessing the applicant's reliability and suitability, account must be taken of the following:

- whether the applicant is bankrupt or whether the applicant is financially capable of managing his/her affairs and meeting his/her legal obligations
- whether the applicant has more than minor debts in relation to his solvency to be recovered by way of enforcement or debts returned from seizure by means of certificates of insolvency impediment
- whether the applicant has, or has had in the current year or in the preceding three calendar years, repeated or significant failures to fulfil their obligations relating to taxes or statutory payments;
- whether the applicant has been made subject to a business prohibition or a temporary business prohibition

For the assessment of the above-mentioned issues, documentation describing the applicant's compliance with obligations must be submitted as an annex to the application.

The certificates must contain sufficient information on the applicant's compliance with its obligations to ensure that the conditions for granting the permit are met. Evidence of compliance may include, for example:

- proof of the applicant's tax debt situation
- a certificate of the applicant's enforcement status
- proof of the applicant's disqualification from business;

The applicant may also prove his/her reliability and suitability with regard to the issues referred to in paragraphs 2-5 of subsection 2 of section 10 of the Gambling Act by means of other certificates, registration excerpts or similar official documents.

Any reliability and suitability documents of the authorities, such as certificates and extracts from registers, that are submitted as an annex to the application must indicate the name and contact details of the authority that prepared the document. The annexes shall be up-to-date. Documents up to six months old from the date of the application are considered to be up-to-date, provided that the information has not changed since the date of the document. The applicant is responsible for the accuracy and timeliness of the annexes.

## 7 Requests for additional information and clarification

The Authority may request the applicant, during the examination of the authorisation, to provide such additional information and explanations as it deems necessary for the decision on the case. Under Section 11(4) of the Gambling Act, at the request of the supervisory authority, the applicant must provide without delay the additional information necessary for the resolution of the case. The applicant shall inform the supervisory authority without delay or within the time limit set by the authority of any facts or changes affecting the accuracy of the information provided in the licence application.

According to section 11(5), the supervisory authority shall have the right to disregard a submitted report, reply or other such document if the submitted document is clearly incomplete, submitted after the given deadline or does not correspond in substance to the information requested by the supervisory authority or to the matter under consideration.

## 8 Entry into force

This regulation enters into force on 1 January 2026.

**The National Police Board**  
**Gambling administration**  
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